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Attorneys for Plaintiffs and Opt-In Plaintiffs  
[Additional Counsel of Record listed on the next page]

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,  
LINDSAY ELIZABETH, AND HEATHER  
HENDER, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No. 3:18-cv-01477-JR

**CONSENT TO BECOME PARTY  
PLAINTIFF IN  
COLLECTIVE ACTION UNDER 29  
U.S.C. § 216(b)**

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Additional Attorneys for Plaintiffs and Opt-In Plaintiffs

1. I, Jessica Westerhof, consent to be a party plaintiff in the above-listed action under 29 U.S.C. § 216(b), and agree to be bound by any settlement or judgment of the Court in the action.

2. I worked for Defendant Nike, Inc. in and around Beaverton, Oregon from approximately June, 2015, through approximately October, 2018.

3. I was an Entry Level Buying Coordinator Contractor for Nike on the E-Commerce/Full Price Stores side of the Nike Direct to Consumer Field & Team Sports: NFL, MLB, NCAA Branded organization, for Men's, Women's, and Kids apparel, from approximately June, 2015, to January, 2016. In January, 2016, I was hired on as a full-time employee Assistant Buyer in the same organization and category. In September, 2017, I became an Associate Merchandiser/Merchant in the same organization and category. I left Nike in October, 2018. In my organization, when I left in October, 2018, there were nine Director/Manager level employees, all but one of whom were male. In contrast, all of the lower-level associates were female, with the exception of one male. Of the eight Senior Director/Manager/VP level employees, only three were female, and the rest were male.

4. On information and belief, Nike paid me less, including with respect to salary and bonuses, than men for doing substantially similar work. Upon becoming an Associate Merchandiser/Merchant in September 2017, Nike tasked me with duties that far exceeded that of my job title and instead, were similar duties performed by other Nike employees at higher job titles (Managers) and Band levels (U-Band). One male Manager, who I understand was a U-Band employee, performed similar work as I did, which was evidenced by the fact that we reported to the same manager, were tasked with similar deliverables, and attended the same manager-level meetings. In fact, Nike assigned me several stretch roles where I was responsible for this male colleague's work while he was on leave, including several months in the last year of my tenure to cover the work duties of this individual while he was on sabbatical and parental leave. Despite performing the Manager and U-Band level work, Nike continued

to underpay me and refused to promote to a higher job or Band level (as an L-Band, I was one level below my male colleague).

5. On information and belief, Nike underpaid me even when compared to other male peers with the same job position of Associate Merchandiser/Merchant. Just months before I left Nike over its inequitable pay practices, Nike determined that I was significantly underpaid for my role. However, Nike never paid me any back pay, even after determining that I had been underpaid.

6. During my employment, in approximately January, 2018, my direct supervisor at the time, a male Director of Merchandising for Men's on Nike.com, made a disparaging gender-based comment to me. This male supervisor remarked to me that he found it to be "funny" that all of his managers were men, and all of his associates (lower level) were women (with the exception of one female manager).

7. During my employment, in approximately March, 2018, I was subjected to an offensive gender-based slur by my other male direct (by dotted line) supervisor, who, at the time, was a Marketing Manager. This supervisor likened me to a vehicle he had just purchased, a Chevy Tahoe, and told me that he did not want people to say of me "watch out for that *bitch* coming through." That same supervisor also called young female Buying Coordinators his "Charlie's Angels", which I found to be demeaning towards women. I am aware that my supervisor was promoted after I left Nike.

8. I authorize Plaintiffs' counsel to file this consent with the Clerk of the Court.

9. Upon consideration of my rights with respect to my legal representation, I hereby authorize the named Plaintiffs' counsel (Goldstein, Borgen, Dardarian & Ho; Ackermann & Tilajef PC; India Lin Bodien, Attorney at Law; and Markowitz Herbold PC) to make decisions with respect to the conduct and handling of this action, including the settlement thereof, as they deem appropriate or necessary.

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Please type or print in ink the following:

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Michigan

48103

(City)

(State)

(Zip)

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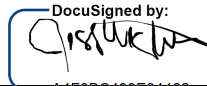
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Date: 1/24/2021

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